

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
Barbara A. Baker, a/k/a Barbara Baker,	:	
Debtor	:	
	:	
M&T Bank,	:	
Movant	:	
Vs.	:	NO.: 5:19-bk-04525 RNO
	:	
Barbara A. Baker, a/k/a Barbara Baker	:	
Respondent	:	
	:	
Charles J. Dehart, III, Esquire	:	
Trustee	:	11 U.S.C. Section 362
	:	

**DEBTOR'S RESPONSE IN OPPOSITION
TO MOTION OF M&T BANK FOR RELIEF FROM AUTOMATIC STAY**

The Debtor, BARBARA A. BAKER, by and through her attorney, Joseph M. Blazosek, Esquire, hereby files the following Response in Opposition to Movant's Motion for Relief from Automatic Stay and in support of same sets forth the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

5. Admitted.

6. Denied as stated. The Debtor has made post-petition payments, however said amount may be in dispute, and it is further averred that proof at time of hearing is demanded on the allegation set forth in averment 6 of Movant's Motion.

7. Denied as stated; proof of said allegation is demanded at time of hearing.

8. Denied as stated; on the contrary, Debtor is entitled to protection under the automatic stay and there is no basis to obtain relief from stay as averred by Movant. By further answer, any additional sums due to Movant can be resolved by including same in Debtor's Amended Chapter 13 Plan and Debtor's real estate is necessary for an effective reorganization and rearrangement of debt and for such reasons, the Motion for Relief from Stay should be denied.

9. Denied as stated; proof of said allegation is demanded at time of hearing.

10. Denied as stated; proof of said allegation is demanded at time of hearing.

WHEREFORE, Debtor respectfully requests that the Court enter an Order denying the Motion of M&T Bank for Relief from Automatic Stay and such other relief the Court deems just and proper.

Respectfully submitted,

/s/ *Joseph M. Blazosek*

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